## UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 14

CONSOLIDATED COMMUNICATIONS d/b/a ILLINOIS CONSOLIDATED TELEPHONE COMPANY,	) ) )		
Respondent,	)	Case	14-CA-094626 and 14-CA-101495
and	)		14-0A-101433
LOCAL 702, INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,	) ) )		
Charging Party.	)		

## **CHARGING PARTY'S MOTION TO EXCEED PAGE LIMITATIONS**

COMES NOW Charging Party Local 702, International Brotherhood of Electrical Workers ("Local 702"), by and through counsel, and pursuant to Section 102.46(j), respectfully requests the Board to permit it to file an answering brief to Respondent's exceptions in excess of 50 pages and up to 75 pages. In support therefore, Local 702 states as follows:

- 1. Respondent has filed 176 exceptions to the ALJ's decision.
- 2. Respondent was granted permission to file a brief in support of its exceptions in excess of 50 pages, not to exceed 75 pages.
  - 3. Respondent's brief in support of its exceptions is 75 pages.
- 4. To adequately respond to Respondent's exceptions, the Charging Party may need more than 50 pages and, in the interests of fairness, the same number of pages permitted Respondent, to make its arguments in opposition to Respondent's exceptions.

5. Charging Party seeks permission to exceed 50 pages only for its answering brief. If Charging Party files any cross-exceptions to any portion of the ALJ's decision, it will limit its brief in support of those cross-exceptions to 50 pages.

6. Counsel for the Charging Party has spoke to Counsel for the General Counsel about this request and she does not object.

WHEREFORE, Charging Party respectfully requests permission to file an answering brief in excess of 50 pages, and up to 75 pages.

Respectfully submitted,

/s/ Christopher N. Grant\_

Christopher N. Grant (III. Bar #6277560) Schuchat, Cook & Werner 1221 Locust Street, 2<sup>nd</sup> Floor St. Louis, Missouri 63103 (314) 621-2626

Fax: (314) 621-2378 cng@schuchatcw.com

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he electronically filed a copy of the foregoing with the National Labor Relations Board on this 10th day of January 2014 and sent via e-mail a copy to the following:

David Lonergan
Robert T. Dumbacher
Hunton & Williams
Fountain Place
1445 Ross Avenue, Suite 3700
Dallas, Texas 75202-2799
dlonergan@hunton.com
rdumbacher@hunton.com

Paula Givens
Counsel for the General Counsel
National Labor Relations Board, Region 14
1221 Spruce Street, Room 8.302
St. Louis, Missouri 63103
paula.givens@nlrb.gov

Brad Beisner IBEW, Local 702 106 North Monroe Street West Frankfort, IL 62896 bbeisner@ibew702.org

/s/ Christopher N. Grant
Christopher N. Grant

543948.docx